

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
Curtis A. Raymond	:	Chapter 13
Anne M. Raymond	:	No.: 19-15647-ELF
Debtor(s)	:	

RESPONSE OF DEBTOR TO THE MOTION FOR RELIEF OF AUTOMATIC
STAY FILED BY US BANK NATIONAL ASSOCIATION

Debtors, Curtis and Anne Raymond, by and through their undersigned Counsel, Brad J. Sadek submit the following in response to the Motion for Relief filed by US Bank National Association:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted payments were missed. Debtors ask for the chance to catch up.
7. No response required.
8. Debtors are unsure of the same as they aver some payments have been made including a recent payment of \$1300.00.
9. Denied. Debtors aver a recent payment was made and ask for the chance to catch up the remaining post-petition arrears and attorney fees through a Modified Chapter 13 Plan.
10. No response required.

WHEREFORE, based on the aforementioned, Movant shall be denied an Order modifying the Automatic Stay under Bankruptcy Code Section 362.

Respectfully submitted,

Dated: February 18, 2021

/s/ Brad J. Sadek, Esq.
Attorney for the Debtor
Sadek & Cooper
1315 Walnut Street, #502
Philadelphia, PA 19107
(215) 545-0008

CERTIFICATE OF SERVICE

I Brad J. Sadek, Esq. certify that on the date indicated below served a true and correct copy of the Debtor's Response to the Motion for Relief from Automatic Stay by electronic or Regular U.S. Mail on all creditors and the following parties:

William C. Miller, Esq.
Chapter 13 Trustee

Rebecca A. Solarz
Electronic Notice
Attorney for Movant

Dated: February 18, 2021

/s/Brad J. Sadek, Esq
Brad J. Sadek, Esq.
Attorney for Debtor
1315 Walnut Street
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